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18 UNITED STATES DISTRICT COURT
19 CENTRAL DISTRICT OF CALIFORNIA
20

21
22 **THOMAS E. PEREZ,**
Secretary of the United States
23 Department of Labor,

24 Plaintiff,

25 v.

26 **GREATBANC TRUST COMPANY,**
27 et al.,

28 Defendants.

Case No. ED-CV12-1648-R (DTBx)

**NOTICE OF SETTLEMENT AND
STIPULATION TO ENTRY OF
ORDER**

1 The parties hereto through their respective counsel of record hereby
 2 notify the Court that the Secretary of Labor and defendant GreatBanc Trust
 3 Company ("GreatBanc") have reached a Settlement Agreement to settle and
 4 dispose of all claims in this case. The parties hereto further stipulate that the
 5 Court should enter the proposed Order filed concurrently herewith, which
 6 incorporates the parties' Settlement Agreement (attached hereto as Exhibit 1),
 7 seeks dismissal of this action with prejudice and without costs, and provides
 8 for the Court to retain jurisdiction over the monetary terms of the Settlement
 9 Agreement.

10 It is so stipulated.

12 Dated: June 2, 2014

13 M. PATRICIA SMITH
 14 Solicitor of Labor

15 G. WILLIAM SCOTT
 16 Acting Associate Solicitor
 17 Plan Benefits Security Division

Respectfully submitted:

RISA D. SANDLER
 Counsel for Fiduciary Litigation

ROBERT L. FURST
 Senior Trial Attorney

18 /s/ Syma Ahmad
 19 SYMA AHMAD
 20 JEFFREY M. HAHN
 21 DAVID M. ELLIS

22 Attorneys for Plaintiff

23 DATED: June 2, 2014

DRINKER BIDDLE & REATH LLP

25 By: /s/ Joseph C. Faucher
 26 JOSEPH C. FAUCHER
 27 Attorneys for Defendant
 28 GreatBanc Trust Company

CERTIFICATE OF SERVICE

I hereby certify that on this 2nd day of June, 2014, true and correct copies of the following documents in the above-captioned case were served on counsel of record via the court's CM/ECF system:

Notice of Settlement and Stipulation to Entry of Order;
Exhibit 1 – Settlement Agreement, with Attachment A; and
Exhibit 2 – [Proposed] Order Incorporating Settlement Agreement and Dismissing Action

/s/ Syma Ahmad

Syma Ahmad
Trial Attorney